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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

2013 JUN 27 PM 1:16

MACQUEL NALLY-Hubbard

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. _____

Tennessee Mental Health
Consumer's Association

(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, MACQUEL NALLY-Hubbard
(name of plaintiff)

is a citizen of the United States and resides at 1994 MYRON COVE North
(street address)

Cordova USA TN
(city) (country) (state)

38010 401-288-4667
(zip code) (telephone number)

3. Defendant Tennessee Mental Health Consumers
Association (defendant's name)
lives at, or its business is located at 455 Woodland St.
Nashville, TN 37206 (street address)

4. Plaintiff sought employment from the defendant or was employed by the defendant at
669 Madison Ave Memphis, TN
Memphis USA TN 38103
(city) (country) (state) (zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of
this complaint on or about JUNE 2012
(day) (month) (year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment
Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this
complaint on or about AUGUST 2012
(day) (month) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity
Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this
complaint on or about AUGUST 2012
(day) (month) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue,
which was received by plaintiff on 28 / 3 / 13. (Attach a copy of the notice to
(day) (month) (year)
this complaint.)

9. Because of plaintiff's (1) ☒ race, (2) ☒ color, (3) ☒ sex, (4) ___ religion,
(5) ___ national origin, defendant

(a) ___ failed to employ plaintiff.

(b) ☒ terminated plaintiff's employment.

(c) ☒ failed to promote plaintiff.

(d) _____

10. The circumstances under which defendant discriminated against plaintiff were as follows:

I applied for a job & was denied employment due to race & sex. I was then retaliated against several times which including being fired.

11. The acts set forth in paragraph 9 of this complaint

- (a) ___ are still being committed by defendant.
- (b) ___ are no longer being committed by defendant.
- (c) ☒ may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) ___ Defendant be directed to employ plaintiff, or
- (b) ___ Defendant be directed to re-employ plaintiff, or
- (c) ___ Defendant be directed to promote plaintiff, or;
- (d) ☒ Defendant be directed to

pay plaintiff two years of salary of what the plaintiff would have earned. Pain & suffering for the stress of this situation

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes ☒ No ☐

R. Nally-Hubbard
SIGNATURE OF PLAINTIFF